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September 23, 1998

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SEP 23 1998

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

BY HAND

Secretary
Federal Communications Commission
Room 222
1919 M Street, N.W.
Washington, DC 20554

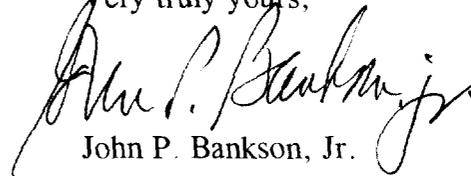
In re: MM Docket No. 98-123,
Reply Comments of Ingleside Radio, Inc.

Dear Ms. Salas:

On behalf of Ingleside Radio, Inc., we are filing the original and four (4) copies of its Reply Comments in the above docket.

Please stamp as received the enclosed copy of this filing and return it to our courier.

Very truly yours,


John P. Bankson, Jr.

JPB/jb

Enclosures

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List A B C D E

RECEIVED

SEP 23 1998

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Before the
Federal Communications Commission
Washington, DC 20554

In the Matter of)
)
Amendment of Section 73.202(b),) MM Docket No. 98-123
Table of Allotments) RM-9291
FM Broadcast Stations)
(Marysville and Hilliard, Ohio))

TO: Chief, Allocations Branch
Policy and Rules Division
Mass Media Bureau

REPLY COMMENTS OF INGLESIDE RADIO, INC.

Ingleside Radio, Inc., by its attorneys and pursuant to 47 C.F.R. § 1.415(c), files its Reply Comments to Citicasters, Inc.,¹ on its proposed move in of WKFX(FM) from Marysville, OH, to Hilliard, OH, and amendment of the FM table allotments, 47 C.F.R. § 73.202(b), accordingly.²

1. If the move in of WKFX(FM) [changed to WZAZ-FM]³ to Hilliard in the Columbus Urbanized Area is approved, Citicasters/Jacor will have five radio stations in that Urbanized Area. While Citicasters/Jacor tries in its Comments to establish that Hilliard is a separate community from Columbus, it has failed. The City of Hilliard authorities acknowledge

¹ Citicasters, Inc., (now Jacor Communications Company) is the parent of Jacor Broadcasting Corporation (see, e.g., FCC Form 315 for WSAI, Cincinnati, OH, filed August 5, 1998, Exhibit 3). They or either of them as the context requires will be referred to herein as Citicasters/Jacor

² These Reply Comments are timely filed on the date specified in the NPRM released July 17, 1998 [DA 98-1373].

³ This call sign was assigned to a Columbus, OH, station owned by Citicasters/Jacor which it agreed to sell in order to satisfy the Antitrust Division of the Department of Justice in order to acquire or retain four radio stations in Columbus with 38% of the radio market.

in their City Profile that Hilliard “. . . is a thriving suburban community. . .”⁴ While the Franklin County Fairgrounds are in Hilliard, Columbus is the county seat and a source of community services for Hilliard. Citicasters/Jacor points to the fact that the Scioto River flows between Columbus and Hilliard. It meanders through Columbus, including downtown. There are multiple ways to reach Hilliard from Columbus, including two four lane bridges on Fishinger Road and Hayden Road. Hilliard is also readily accessible from Interstate 70 and Interstate 270 which passes through Hilliard and has two interchanges in and near Hilliard.⁵

2. Citicasters/Jacor implicitly concedes that Hilliard is a suburb of Columbus with its claim that Hilliard should have a local aural transmission service because four other separate communities in the Columbus Urbanized Area do. If the proposed Hilliard allotment did not involve a move in of the only FM channel allotment to Marysville, that suggestion could have weight, but that is not this case.⁶ Six AM stations and 10 FM stations are licensed to Columbus and communities in the Columbus Urbanized Area. The move in to Hilliard would add a 17th aural transmission service to the Columbus Urbanized Area.

3. Hilliard is contiguous in part to Columbus along its North and South sides. There are facts which tie Hilliard to the Columbus Metropolitan Area as defined by Ameritech. Its Telephone Book includes Hilliard and other nearby communities West and North of Columbus in the Columbus local calling area [Attachment 2].

⁴ Citicasters/Jacor’s Comments Exhibit 3, Item H.

⁵ While I-270 is called the Outerbelt, it is the only beltway around Columbus.

⁶ Stations licensed to communities in the Columbus Urbanized Area are listed in Attachment 1.

4. The Columbus Public Library has a Hilliard Branch.⁷ In its efforts to separate Hilliard from Columbus, Citicasters/Jacor provided a list of churches.⁸ Three of them are in Columbus and six others do not have Hilliard addresses, four in Amlin, one in Galloway, and one in Dublin. Hilliard's water and sewer services are provided by the Columbus Division of Water [Attachment 3].

5. Citicasters/Jacor also provides a collection of restaurants.⁹ Many of them lack a Hilliard Zip Code. Sixteen have a Columbus Zip Code [43204 and 43228], 22% of the total, unexpected from Hilliard promoters, "South Hilliard Area" is a separate restaurant category which is primarily in Columbus.

6. Citicasters/Jacor cite several FM allotment actions, one of which involved a move in,¹⁰ a proposal to change the city of allotment for one of two Class C stations in St. Joe, FL, to Parker, FL. It was approved even though Parker is in the Panama City Urbanized Area. Parker is not contiguous to Panama City, while Hilliard is contiguous to Columbus. There was no change in the antenna site, height or power, only a change in the allotment community. Port St. Joe kept a Class C allotment while Marysville will be left with a weak AM facility, WUCO, if the Hilliard move in is allowed.

7. Another proceeding cited by Citicasters/Jacor is an allotment change where there would be some service to an Urbanized Area. The FCC specifically noted that ". . .since Fort

⁷ See Citicasters/Jacor's comments, Exhibit 3, Item E, p. 2 entry for October 12, 1997.

⁸ Ibid. Item D.

⁹ Ibid. Item G.

¹⁰ Amendment of Section 73.202(b), Table of Allotments, (Parker & Port St. Joe, Florida), 11 FCC Rcd 1095 (Allocations Branch 1996).

Meade is not located within an urbanized area, the reallocation will not result in the transfer of a station from a rural to a large urban area. . .”, not the case here where Hilliard is a significant urban part of the Columbus Urbanized Area.¹¹ Citicasters/Jacor selects snippets of text from other FM allotment proceedings inapplicable to the Hilliard move in; (1) a first FM allotment to one community instead of a fifth allotment to another;¹² (2) an adjudicatory proceeding to determine a favored community under 47 U.S.C. §307(b) and the former 25 mile rule;¹³ (3) a proposed new allotment, not a move in, denied for lack of a transmitter site;¹⁴; (4) preferential assignments among communities equalizing transmission services;¹⁵ and (5) switches of FM channel allotments in order to provide service to additional people.¹⁶

8. None of these allotment assignments and changes support the move in of WKFX(FM) from Marysville, OH, to Hilliard, OH, as the 17th radio station in the Columbus Urbanized Area. Marysville is the county seat of Union County, OH, outside both the Columbus Urbanized Area and the Metropolitan Statistical Area. The facts do not support the Hilliard

¹¹ Amendment of Section 73.202(b), Table of Allotments, FM Broadcast Stations (Arcadia & Fort Meade, FL) 13 FCC Rcd 2989 (Allocations Branch 1998).

¹² Amendment of Section 73.202(b), Table of Allotments, FM Broadcast Stations (Durango & Dolores, Colorado) 12 FCC Rcd 9740 (Allocations Branch 1997).

¹³ Faye & Richard Tuck, Inc., 3 FCC Rcd 5374 (1998).

¹⁴ Amendment of Section 73.202(b), Table of Allotments, FM Broadcast Stations (Amelia, Louisiana) 12 FCC Rcd 13930 (Allocations Branch 1997).

¹⁵ Amendment of Section 73.202(b) Table of Allotments, FM Broadcast Stations (Douglas, Tiffin & Unionville, Georgia) 12 FCC Rcd 1280 (Policy and Rules Division, 1997).

¹⁶ Amendment of Section 73.202(b), Table of Allotments, FM Broadcast Station (Albion, Honeoye Falls and South Bristol Township, New York, DA 98-1574, MM Docket No. 98-8, Allocations Branch, released August 14, 1998), and to the same effect amendment of Section 73.202(b), Table of Assignments, FM Broadcast Stations (Albany, Georgia, Marianne & Quincy, Florida), 4 FCC Rcd 2631 (Allocations Branch 1989).

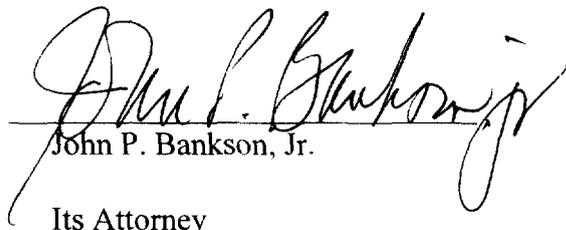
move in. This reallocation must be rejected and the Notice of Proposed Rule Making in MM Docket No. 98-123 dismissed or withdrawn.

Respectfully submitted,

INGLESIDE RADIO, INC.

Drinker Biddle & Reath LLP
901 15th Street, N.W., Suite 900
Washington, DC 20005-2333

By:

A handwritten signature in cursive script, appearing to read "John P. Bankson, Jr.", written over a horizontal line.

John P. Bankson, Jr.

Its Attorney

(202) 842-8806

September 23, 1998

ATTACHMENT 1

COLUMBUS URBANIZED AREA RADIO STATIONS

COLUMBUS

WCOL-FM*
WNCI(FM)*
WBNS-FM
WBZX(FM)
WLVQ(FM)
WSNY(FM)
WFII*
WTVN*
WBNS
WMNI
WVKO

GROVE CITY

WWCD(FM)

WESTERVILLE

WAXV(FM)

GAHANNA

WCVO(FM)

UPPER ARLINGTON

WXMG(FM)

WORTHINGTON

WRFD

*Citicasters/Jacor Stations

ATTACHMENT 2

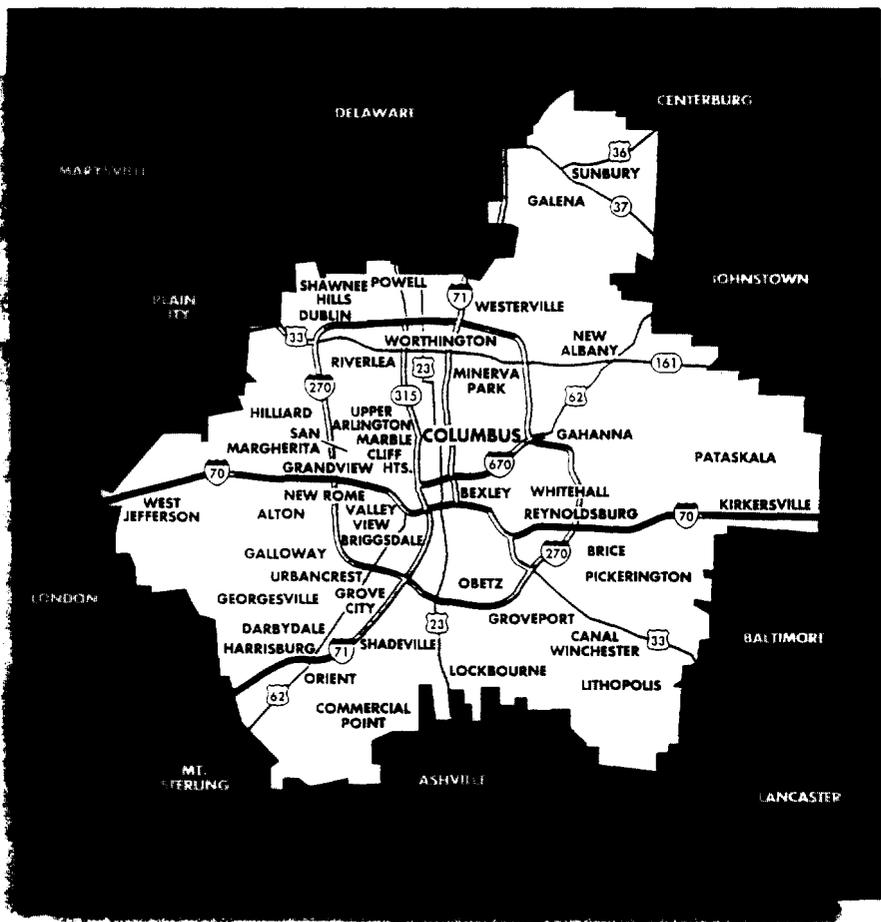
Ameritech[®]



February 1998
Area Codes 614 & 740

 **PagesPlus[®]**

1998-99



Columbus and Vicinity Local White Pages for:

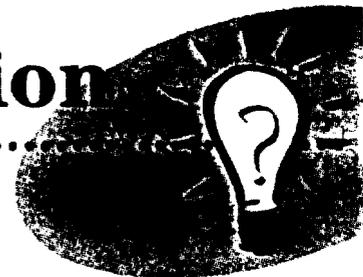
Alton	Minerva Park
Bexley	New Albany
Brice	New Rome
Briggsdale	Obetz
Canal Winchester	Orient
Columbus	Pataskala
Commercial Point	Pickerington
Darbydale	Powell
Dublin	Reynoldsburg
Gahanna	Riverlea
Galena	San Margherita
Galloway	Shadeville
Georgesville	Shawnee Hills
Grandview Heights	Sunbury
Grove City	Upper Arlington
Groveport	Urbancrest
Harrisburg	Valleyview
Hilliard	Westerville
Kirkersville	West Jefferson
Lithopolis	Whitehall
Lockbourne	Worthington
Marble Cliff	

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Find our Yellow Pages on the Internet:
<http://yp.ameritech.net>

This directory includes the complete listings of all local telephone companies, including:
Ameritech, C3G, Frontier, ICG, LCI, MCI, NEXTLINK, Sprint, USN, Worldcom

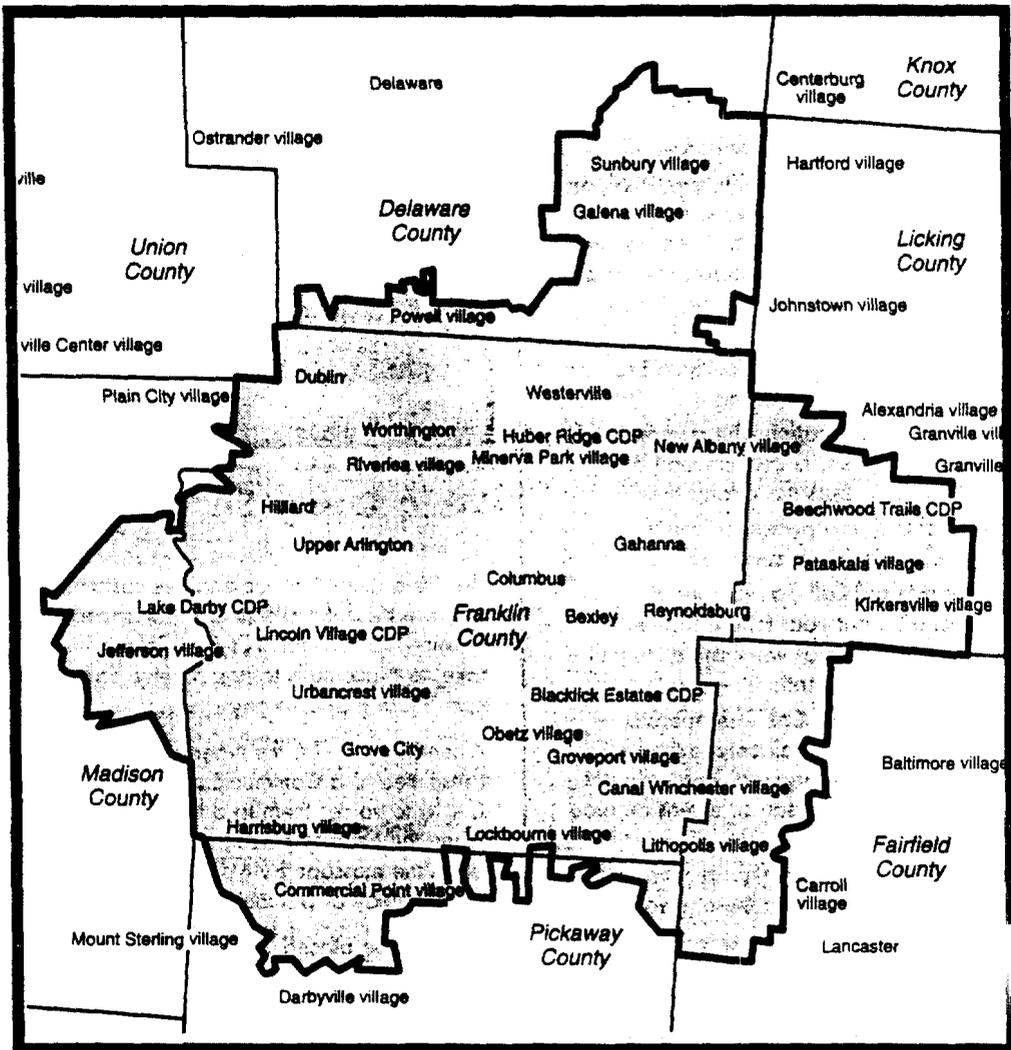
Calling Information



LOCAL CALLING AREA

The local calling areas of telephone companies offering service in the geographic coverage of this directory may differ by telephone company and are subject to change. **Specific information on the telephone numbers in your local calling area is available by calling your local telephone company at the Customer Service number shown on page 2 in the Telecom Overview section of this directory.**

For most directory recipients, calls within the area shown on the map to the right will be local calls.



CALLING INFORMATION

Information

When you can't find a number or the listing is new, Information can help.

DIAL - 411*

For numbers within your area code

DIAL - 1 + area code + 555-1212*

For numbers outside your area code

DIAL - 1 + 800 + 555-1212*

For 800 or 888 numbers

*To better serve customers, calls to these telephone numbers may be monitored by supervisory personnel.

Local & Long Distance Dialing

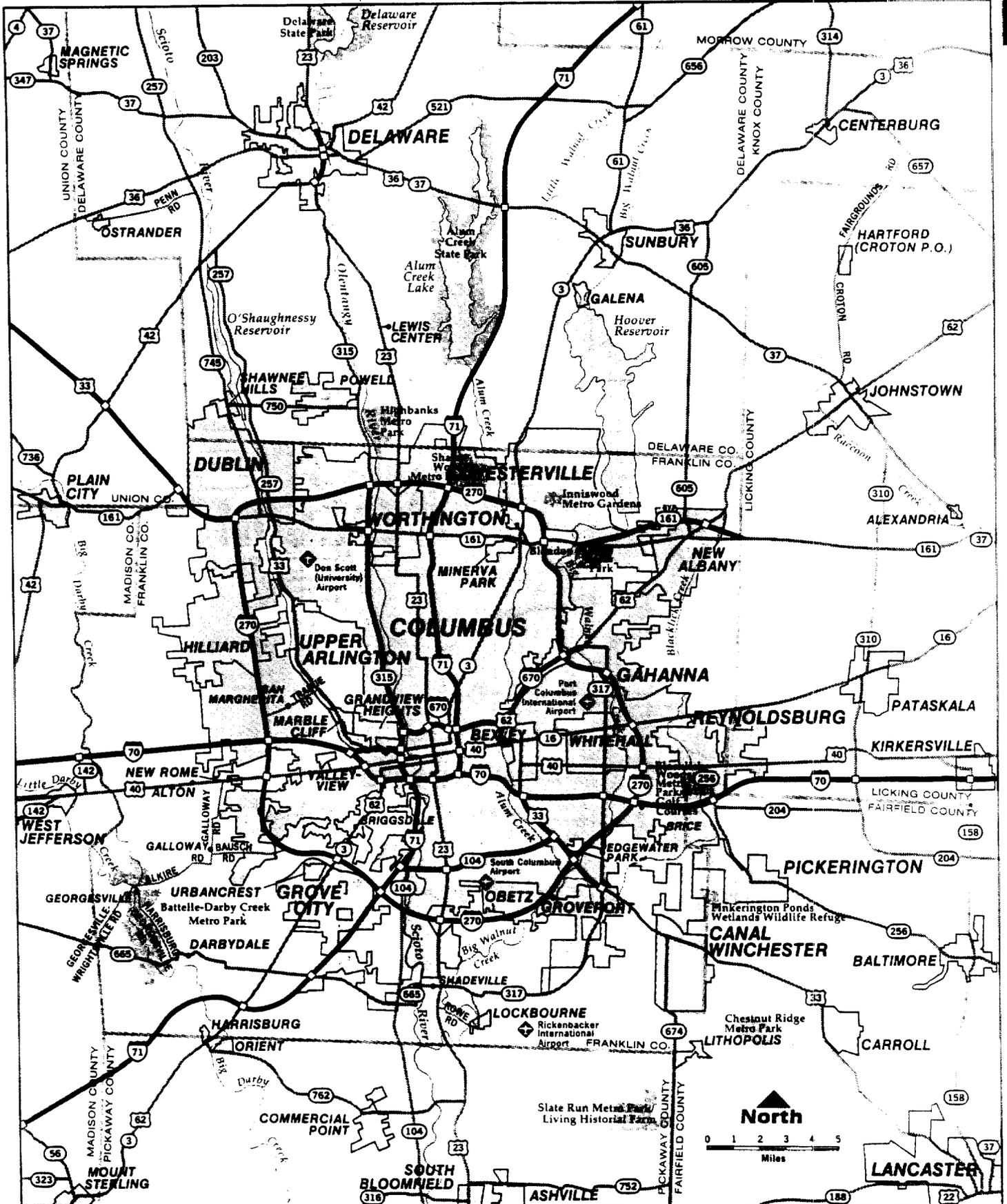
- Local call within your area code
- dial 7 digit number
- Local call outside your area code
- dial 1 + area code + 7 digit number
- Long Distance direct dial station paid
- dial 1 + area code + 7 digit number
- Long Distance alternately billed
- dial 0 + area code + 7 digit number
- Toll free 800 or 888 numbers
- dial 1 + 800 or 888 + 7 digit number

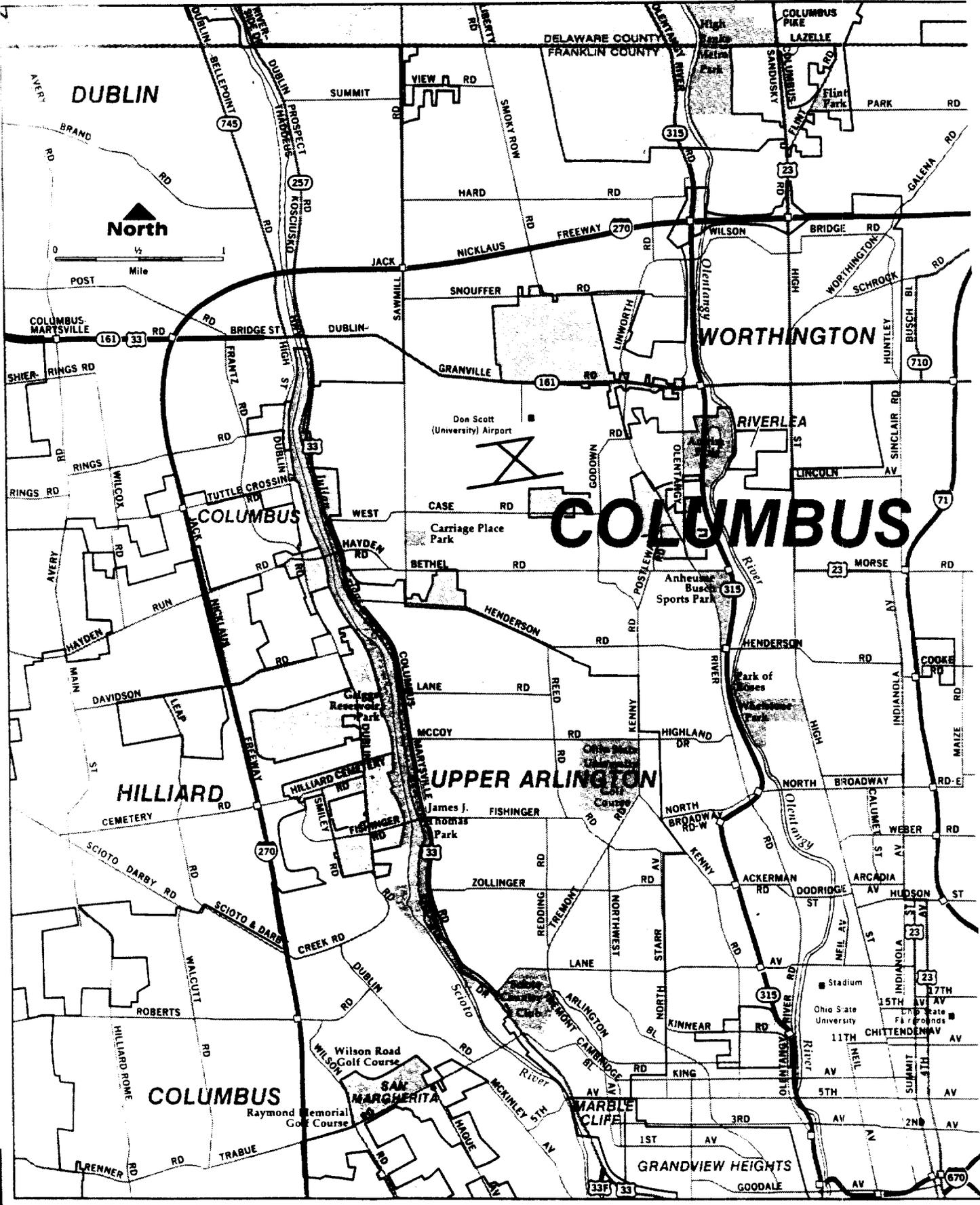
Rates To Other Calling Areas

Long distance service to other calling areas, states and countries is provided by long distance companies. Rates are determined by the company that provides the service.

Operator Assisted & Calling Card Charges

Service charges may apply when the operator helps place a local or long distance call. Conversation is billed at direct-dial rates.





ZIP Code & Street Guide

LOCAL AREA POSTAL ZIP Codes



HELP US HELP YOU Use ZIP Code

As a public service for the Post Office and for our customers, Ameritech is pleased to reproduce ZIP Code Information just as it is provided by the local Post Office. ZIP Code information is subject to change and therefore cannot be guaranteed as correct in this ZIP Code section.

FOR COMMENTS ABOUT AND/OR ADDITIONAL ZIP CODE INFORMATION, PLEASE CALL THE COLUMBUS UNITED STATES POSTAL SERVICE ZIP CODE INFORMATION SERVICE AT 469-4200, ZIP STATION INFORMATION AT 469-4410, OR YOUR LOCAL POST OFFICE. THE TELEPHONE NUMBERS CAN BE FOUND IN THE BLUE PAGES UNDER "GOVERNMENT-POSTAL SERVICE-CITY OFFICES OR AREA POST OFFICES."

ZIP CODE GUIDE (STREET ADDRESS DELIVERY ONLY - ALPHABETICAL)			
AMLIN	43002	COLUMBUS	43219
BLACKLICK	43004	COLUMBUS	43220
CANAL WINCHESTER	43110	COLUMBUS	43221
COLUMBUS	43201	COLUMBUS	43222
COLUMBUS	43202	COLUMBUS	43223
COLUMBUS	43203	COLUMBUS	43224
COLUMBUS	43204	COLUMBUS	43225
COLUMBUS	43205	COLUMBUS	43227
COLUMBUS	43206	COLUMBUS	43228
COLUMBUS	43207	COLUMBUS	43229
COLUMBUS	43209	COLUMBUS	43230
COLUMBUS	43210	COLUMBUS	43231
COLUMBUS	43211	COLUMBUS	43232
COLUMBUS	43212	COLUMBUS	43235
COLUMBUS	43213	COLUMBUS	43240
COLUMBUS	43214	COLUMBUS	43251
COLUMBUS	43215	COLUMBUS	43253
COLUMBUS	43217	COLUMBUS	43260
		COLUMBUS	43265
		COLUMBUS	43266
		COLUMBUS	43267
		COLUMBUS	43268
		COLUMBUS	43269
		COLUMBUS	43270
		COLUMBUS	43271
		COLUMBUS	43272
		COLUMBUS	43279
		COLUMBUS	43284
		COLUMBUS	43285
		COLUMBUS	43286
		COLUMBUS	43287
		COLUMBUS	43291
		COLUMBUS	43299
		DUBLIN	43016
		DUBLIN	43017
		GALENA	43021
		GALLOWAY	43119
		GROVE CITY	43123
		GROVEPORT	43199
		HILLIARD	43026
		LITHOPOLIS	43136
		LOCKBOURNE	43137
		NEW ALBANY	43054
		ORIENT	43146
		PATASKALA	43062
		PICKERINGTON	43147
		POWELL	43065
		REYNOLDSBURG	43068
		SUNBURY	43074
		WEST JEFFERSON	43162
		WESTERVILLE	43081
		WESTERVILLE	43086
		WORTHINGTON	43085

ZIP CODE GUIDE (POST OFFICE BOX DELIVERY ONLY) ALPHABETICAL	
BRICE	431
COLUMBUS AIR MAIL FACILITY	432
COLUMBUS BUSCH FINANCE STATION	432
COLUMBUS MAIN OFFICE	432
COLUMBUS MAIN OFFICE	432
COLUMBUS W. WORTHINGTON STATION	432
COMMERCIAL POINT	431
HARRISBURG	431

ZIP CODE GUIDE (STREET ADDRESS DELIVERY ONLY - NUMERICAL)			
43002	AMLIN	43214	COLUMBUS
43004	BLACKLICK	43215	COLUMBUS
43016	DUBLIN	43217	COLUMBUS
43017	DUBLIN	43219	COLUMBUS
43021	GALENA	43220	COLUMBUS
43026	HILLIARD	43221	COLUMBUS
43054	NEW ALBANY	43222	COLUMBUS
43062	PATASKALA	43223	COLUMBUS
43065	POWELL	43224	COLUMBUS
43068	REYNOLDSBURG	43225	COLUMBUS
43074	SUNBURY	43227	COLUMBUS
43081	WESTERVILLE	43228	COLUMBUS
43085	WORTHINGTON	43229	COLUMBUS
43086	WESTERVILLE	43230	COLUMBUS
43110	CANAL WINCHESTER	43231	COLUMBUS
43119	GALLOWAY	43232	COLUMBUS
43123	GROVE CITY	43235	COLUMBUS
43125	GROVEPORT	43240	COLUMBUS
43136	LITHOPOLIS	43251	COLUMBUS
43137	LOCKBOURNE	43253	COLUMBUS
43146	ORIENT	43260	COLUMBUS
43147	PICKERINGTON	43265	COLUMBUS
43162	WEST JEFFERSON	43266	COLUMBUS
43199	GROVEPORT	43267	COLUMBUS
43201	COLUMBUS	43268	COLUMBUS
43202	COLUMBUS	43269	COLUMBUS
43203	COLUMBUS	43270	COLUMBUS
43204	COLUMBUS	43271	COLUMBUS
43205	COLUMBUS	43272	COLUMBUS
43206	COLUMBUS	43279	COLUMBUS
43207	COLUMBUS	43284	COLUMBUS
43209	COLUMBUS	43285	COLUMBUS
43210	COLUMBUS	43286	COLUMBUS
43211	COLUMBUS	43287	COLUMBUS
43212	COLUMBUS	43291	COLUMBUS
43213	COLUMBUS	43299	COLUMBUS

ZIP CODE GUIDE (POST OFFICE BOX DELIVERY ONLY) NUMERICAL	
43109	BR
43116	COMMERCIAL POI
43126	HARRISBU
43216	COLUMBUS MAIN OFF
43218	COLUMBUS MAIN OFF
43226	COLUMBUS BUSCH FINANCE STATI
43234	COLUMBUS W. WORTHINGTON STATI
43236	COLUMBUS AIR MAIL FACIL

ATTACHMENT 3

COLUMBUS DIVISION OF WATER SERVICE CONNECTION CHARGE SHEET

TAP CHARGE		METER CHARGE				SYSTEM CAPACITY CHARGE			FRONTAGE CHARGE
SIZE	CHARGE	SIZE	TYPE	CHARGE	INST. BY	INSIDE COLUMBUS	#/CONTRACT AREA	NON-CONTRACT AREA	
3/4"	\$1,800.00	5/8"	DISC	\$106.00 \$120.00**	CITY	\$1,226.00	\$1,593.00	\$1,838.00	\$17.00
3/4"	\$1,800.00	3/4"	DISC	\$138.00 \$168.00**	"	\$1,226.00	\$1,593.00	\$1,838.00	"
1"	\$1,980.00	1"	DISC	\$177.00 \$216.00**	"	\$2,248.00 FPO \$1274.00	\$2,312.00 \$1,686.00 F.P.O.	\$3,022.00 \$1,911.00 F.P.O.	"
1.5"	\$2,160.00	1.5"	DISC	\$463.00	"	\$2,295.00 F.P.O.	\$4,294.00 F.P.O.	\$4,943.00 F.P.O.	"
2"	\$2,300.00	2"	CT	\$932.00	CONTR.	\$11,387.00 \$5,653.00 F.P.O.	\$12,869.00 \$7,348.00 F.P.O.	\$18,861.00 \$8,488.00 F.P.O.	"
3"	COST+ 25%	3"	FMCT	\$1,118.00 \$4,268.00	"	\$23,267.00 \$11,778.00 F.P.O.	\$38,824.00 \$16,312.00 F.P.O.	\$38,336.00 \$17,868.00 F.P.O.	"
4"	"	4"	CT	\$1,832.00	"	\$38,788.00	\$47,778.00	\$58,128.00	"
4"	"	4"	FMCT	\$4,268.00	"	\$18,378.00 F.P.O.	\$23,887.00 F.P.O.	\$27,882.00 F.P.O.	"
6"	"	6"	FMCT	\$6,913.00	"	\$33,484.00	\$168,326.00	\$128,328.00	"
6"	"	6"	FMCT	\$7,278.00	"	\$41,742.00 F.P.O.	\$84,284.00 F.P.O.	\$82,813.00 F.P.O.	"
8"	"	8"	FMCT	\$7,278.00	"	\$147,888.00	\$181,168.00	\$226,608.00	"
8"	"	8"	FMCT	\$7,278.00	"	\$73,888.00 F.P.O.	\$88,888.00 F.P.O.	\$110,268.00 F.P.O.	"
10"	"	10"	FMCT	\$11,382.00	"	\$228,877.00	\$287,478.00	\$343,488.00	"
10"	"	10"	FMCT	\$11,382.00	"	\$114,488.00 F.P.O.	\$148,838.00 F.P.O.	\$171,733.00 F.P.O.	"
12"	"	10"x12"	FMCT	\$16,932.00	"	\$328,807.00	\$438,748.00	\$494,711.00	"
12"	"	10"x12"	FMCT	\$16,932.00	"	\$164,803.00 F.P.O.	\$214,374.00 F.P.O.	\$247,388.00 F.P.O.	"
16"	"	16"			"	\$387,498.00	\$477,748.00	\$581,248.00	"
16"	"	16"			"	\$193,749.00 F.P.O.	\$238,874.00 F.P.O.	\$278,624.00 F.P.O.	"
	5/8"	3/4"	1"			#/ CONTRACT AREAS			MASTER METERS BEXLEY FRANKLIN S.D.# 4 GAHANNA OBETZ REYNOLDSBURG
YOKE:	\$49.00	\$76.00	\$88.00			BRICE, BROOKSIDE ESTATES, DUBLIN, GRANDVIEW, GROVE CITY GROVEPORT, HAMILTON MEADOWS, HILLIARD, MARBLE CLIFF			
HORN:	\$29.00	\$38.00	\$58.00			MINERVA PARK, NEW ALBANY, RIDGEWOOD ESTATES, RIVERLEA URBANCREST, UPPER ARLINGTON, VALLEYVIEW, VILLAGE PARK WHITEHALL, WORTHINGTON			
<p>** FOR APPROVED METER BOX SETTINGS. THE FMCT METER SHALL BE USED ON COMBINED WATER SYSTEMS OR WHEN A FIRE PROTECTION ONLY SYSTEM HAS MORE THAN TWO FIRE HYDRANTS. WHEN A TAP IS USED FOR FIRE PROTECTION ONLY USE THE SYSTEM CAPACITY CHARGE MARKED F.P.O.</p>									

EFFECTIVE : JANUARY 1, 1998

WATER SEWER RATES EFFECTIVE JANUARY 1, 1997

DIVISION IDENTIFICATION	INT. DIV. CODE	WATER COMMODITY CHARGES PER MCF PER MONTH							SUBURBAN SURCHARGES		SEWER BILLING & COMMODITY			
		1 ST CHARGE PER MCF	2 ND CHARGE PER MCF	3 RD CHARGE PER MCF	4 TH CHARGE PER MCF	5 TH CHARGE PER MCF	6 TH CHARGE PER MCF	7 TH CHARGE PER MCF	BALANCE PER MCF	WATER SURCHG	SEWER SURCHG	FEES PER MONTHLY	FEES PER QUARTERLY	SEWER COMMODITY PER MCF
Columbus	1-1	4.37	10.06	9.48	7.35	7.03	8.29	6.29	n/a	n/a	8.962	2.170	17.088/0539**	18.138
County Rural	2-2	6.58	15.10	14.22	11.03	10.55	9.45	9.45	n/a	n/a	9.681	2.889	20.337	21.387
Brica	6-6	5.89	13.09	12.32	9.56	9.14	8.19	8.19	n/a	n/a	8.816	2.024	19.556	20.606
Brookside Estate	7-2	5.69	13.09	12.32	9.56	9.14	8.19	8.19	10%	10%	8.816	2.024	19.556	20.606
Dublin	7-1	5.89	13.09	12.32	9.56	9.14	8.19	8.19	4.55	8.36	9.916	2.024	19.556	20.606
Grandview	2-5	5.69	13.09	12.32	9.56	9.14	8.19	8.19	n/a	n/a	8.816	2.024	19.556	20.606
Grove City North	4-4	5.89	13.09	12.32	9.56	9.14	8.19	8.19	3.70	3.00/2.00M	8.816	2.024	19.556	20.606
Grove City South	4-5	5.89	13.09	12.32	9.56	9.14	8.19	8.19	3.70	3.00/2.00M	8.816	2.024	19.556	20.606
Groveport	6-7	5.89	13.09	12.32	9.56	9.14	8.19	8.19	10%	10%	8.816	2.024	19.556	20.606
Hamilton Meadows	3-7	5.89	13.09	12.32	9.56	9.14	8.19	8.19	10%	10%	8.816	2.024	19.556	20.606
Hilliard	6-9	5.89	13.09	12.32	9.56	9.14	8.19	8.19	1.075	1.075	8.816	2.024	19.556	20.606
Marblecliff	2-6	5.89	13.09	12.32	9.56	9.14	8.19	8.19	n/a	n/a	8.816	2.024	19.556	20.606
Minerva Park	2-4	5.89	13.09	12.32	9.56	9.14	8.19	8.19	4.60/MCF 3.32/MO	.86	8.816	2.024	19.556	20.606
New Albany	6-8	5.89	13.09	12.32	9.56	9.14	8.19	8.19	n/a	n/a	8.816	2.024	19.556	20.606
Obetz	7-5	5.89	13.09	12.32	9.56	9.14	8.19	8.19	n/a	n/a	n/a	n/a	n/a	n/a
Ridgewood (2)	7-3	11.38	13.09	12.32	9.56	9.14	8.19	8.19	10%	9.98/4.353M	n/a	n/a	n/a	n/a
Ridgewood (1)	7-4	5.69	13.09	12.32	9.56	9.14	8.19	8.19	10%	9.98/4.353M	n/a	n/a	n/a	n/a
Riverlea	2-3	5.89	13.09	12.32	9.56	9.14	8.19	8.19	n/a	n/a	3.316	2.024	19.556	20.606
Upper Arlington	3-3	5.89	13.09	12.32	9.56	9.14	8.19	8.19	2.25	4.65	8.816	2.024	19.556	20.606
Urbancrest	6-2	5.69	13.09	12.32	9.56	9.14	8.19	8.19	2.00/1.08M	2.00/1.08M	8.816	2.024	19.556	20.606
Valleyview	2-9	5.89	13.09	12.32	9.56	9.14	8.19	8.19	n/a	n/a	8.816	2.024	19.556	20.606
Village Park	3-8	5.39	13.09	12.32	9.56	9.14	8.19	8.19	10%	10%	8.816	2.024	19.556	20.606
Whitehall	2-7	5.69	13.09	12.32	9.56	9.14	8.19	8.19	n/a	n/a	8.816	2.024	19.556	20.606
Washington	2-3	5.39	13.09	12.32	9.56	9.14	8.19	8.19	.75	.75	8.816	2.024	19.556	20.606

1) Ridgewood with one meter per account M Minimum charge per month
 2) Ridgewood with two meters per account % Percent of total water or sewer charges = surcharge
 * For % quarterly billed meters only — for larger meters, senior citizens & monthly billed customers, see attached rate charts
 ** Columbus stormwater charge per day per ECU

CERTIFICATE OF SERVICE

I, Josefina Barberena, hereby certify that, on this 23rd day of September, 1998, a copy of the foregoing was served first class, U.S. Mail, postage prepaid on the following:

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Josefina Barberena

*Hand Delivery